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Attorneys for Plaintiff
United States of America

IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,

Plaintiff,

v.

REYES QUINONEZ,

Defendant.

CASE NO. 1:23-CR-00054-JLT-SKO

STIPULATION AND ORDER REGARDING
EXCLUDABLE TIME PERIODS UNDER SPEEDY
TRIAL ACT

DATE: May 15, 2024
TIME: 1:00 p.m.
COURT: Hon. Sheila K. Oberto

Plaintiff United States of America, by and through its counsel of record, and defendant, by and through defendant's counsel of record, hereby stipulate as follows:

This case is set for status conference on May 15, 2024. By this stipulation, defendant now moves to continue the status conference until July 17, 2024, and to exclude time between May 15, 2024, and July 17, 2024, under 18 U.S.C. § 3161(h)(7)(A), B(iv).

a) The government represents that discovery in this matter, including officer worn body camera, police reports, and other items have been produced to defense.

b) Defense counsel needs the additional time to produce supplemental discovery to the government, including investigators reports. These reports are necessary for the government to review in evaluating a potential offer in the case. The defense plans to have those reports finalized and produced within the next several weeks.

c) Defense counsel also requests the additional time to review the discovery, meet

1 with his client, conduct independent investigation, and pursue a pretrial resolution of the case.
2 The government and defense counsel have been in communication about a pretrial resolution of
3 the case and need the additional time to continue those discussions.

4 d) Counsel for defendant believes that failure to grant the above-requested
5 continuance would deny him/her the reasonable time necessary for effective preparation, taking
6 into account the exercise of due diligence.

7 e) The government does not object to the continuance.

8 f) Based on the above-stated findings, the ends of justice served by continuing the
9 case as requested outweigh the interest of the public and the defendant in a trial within the
10 original date prescribed by the Speedy Trial Act.

11 g) For the purpose of computing time under the Speedy Trial Act, 18 U.S.C. § 3161,
12 et seq., within which trial must commence, the time period of May 15, 2024 to July 17, 2024,
13 inclusive, is deemed excludable pursuant to 18 U.S.C. § 3161(h)(7)(A), B(iv) because it results
14 from a continuance granted by the Court at defendant's request on the basis of the Court's
15 finding that the ends of justice served by taking such action outweigh the best interest of the
16 public and the defendant in a speedy trial.

17 2. Nothing in this stipulation and order shall preclude a finding that other provisions of the
18 Speedy Trial Act dictate that additional time periods are excludable from the period within which a trial
19 must commence.

20 IT IS SO STIPULATED.

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23 Dated: May 8, 2024

PHILLIP A. TALBERT
United States Attorney

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25 /s/ JUSTIN J. GILIO
JUSTIN J. GILIO
26 Assistant United States Attorney
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1 Dated: May 8, 2024

/s/ REED GRANTHAM

REED GRANTHAM

Counsel for Defendant

Reyes Quinonez

8 **ORDER**

9 IT IS SO ORDERED.

10 DATED: 5/9/2024

Sheila K. Oberto

THE HONORABLE SHEILA K. OBERTO
UNITED STATES MAGISTRATE JUDGE